

As a friend of many deaf individuals, I have heard so many stories about how video relay services have improved the lives of deaf and hard of hearing Americans in their daily lives. Most deaf people are born to hearing parents (90%) and many hearing families do not learn sign language to communicate with their children, siblings, or other relatives. I have heard countless stories of how my deaf friends now have relationships with their family members for the first time because the language barrier is removed through video relay services. Family members can easily converse over the phone through the deaf person's native language of American Sign Language (ASL) giving them equivalent access to telecommunications services just like hearing people have when calling family or businesses. Deaf individuals can get their foot in the door of a company by talking to a manager before an interview so the manager of a company may actually be willing to hire an interpreter for the interview. This ability to communicate with the hearing world reduces the isolation that so many deaf Americans face every day in a country where very few people know American Sign Language.

I share the above stories to express my concern and outrage at the new proposed reimbursement rate for VRS. I was deeply disturbed to see the Commission's recent Public Notice on VRS rates. These proposals would put an end to VRS as we know it. My VRS employer has already informed me that if these proposed rates are adopted, our company would head into bankruptcy. This would be disastrous for deaf VRS users. The FCC clearly is not taking into consideration the actual costs associated with running VRS companies. Ensuring that deaf individuals have access to VRS and encouraging improvements in VRS should be a high priority for you as Chairman and Commissioners of the FCC. The Americans with Disabilities Act requires the FCC to make available to all deaf individuals nationwide "functionally-equivalent" communications.

You will soon determine the future of VRS. When you set the VRS rate, you will determine whether America makes progress toward the statutory goals of functional equivalence, nationwide access and inclusion ? or force deaf users to revert to TTY communications. I personally have experience the laborious process of text relay in the past and used to cringe when a deaf friend would call me if I was in a hurry. I knew that even a simple call would take a long time and would be filled with miscommunication due to English being the second and weak language of my deaf friends. When I worked for a business with deaf employees and students, we would be short staffed and taking a text relay call would take a long time. Even though I care a great deal about deaf people and I know that they should be able to make a phone call, text relay calls delayed business for me and our customers and I was put out by having to accept these calls. Most businesses do not care about deaf people and their needs to make calls, they care about the efficiency in which calls are taken and completed. Companies that offer services that deaf people access on a regular basis would have to bear great expense again for text calls versus VRS calls which can be done as quickly as a call from a hearing caller. These companies would need more agents to take calls over TTY or text relay and service for deaf consumers would revert back to poor quality due to the written English language barrier.

The FCC should be increasing the availability and use of VRS, not cutting back. You should adopt a

rate that encourages continuing improvements in VRS technology and continues to improve services levels. Recent developments in VRS are a good example of how the service can be improved, such as enhanced 911 services, 10-digit numbering, a larger and better-trained pool of interpreters and better videophones with an array of enhanced features. Monthly payments for broadband are a prohibitive expense for many deaf people, and instead of trying to cut back on VRS, you should be exploring ways to make VRS over broadband more affordable to deaf individuals. If the FCC is in need of funds, perhaps an FCC charge for relay services should be added to cell phone bills in addition to landline bills.

Progress towards functional equivalence will be destroyed if the FCC does not encourage VRS providers to improve VRS and make it more widely available. VRS is a recent and dramatic advancement that benefits those who are deaf, but so much more can be done. It would be tragic if the FCC were to destroy this broadband service that is so vital to the deaf.

Recent reports of fraud in the VRS industry are disturbing to me and other employees who work for a company that has operated within current FCC guidelines and has worked to maintain the integrity of the VRS fund. The FCC must devote more of its time and energy to focusing on the elimination of fraud.

I urge you to establish a fair and predictable rate for VRS that will encourage VRS providers to invest in improving VRS and reaching more deaf individuals. The law requires it and it is the right thing to do.

Sincerely,
Jennifer Smith